

Exhibit C

From: Basile, James F.
Sent: Tuesday, March 27, 2012 12:02 PM
To: 'Daniel Kotchen'
Subject:

Dan, per your request, here are some preliminary thoughts on discovery I think we will need from plaintiffs.

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POTENTIAL TOPICS FOR DOCUMENT DISCOVERY

1. The development by YOU¹ of all FACEBOOK PRODUCTS,² including, without limitation, product development plans, marketing plans, or strategic plans, both prior and subsequent to the launch of FACEBOOK PRODUCTS.
2. The functionality, architecture, design, operation, implementation, or specifications of (a) Yontoo Platform and (b) any FACEBOOK PRODUCTS
3. Technical differences, changes, improvements, modification, proposed improvements, or proposed or actual new features to FACEBOOK PRODUCTS from January 1, 2008 through the present.
4. Technical, advertising, ad creatives, sales, marketing, customer or user presentations made by or to YOU regarding FACEBOOK PRODUCTS.
5. Communications between YOU and any advertiser, advertising broker or seller, advertising partners (including, without limitation, Rubicon Project, AdMeld, OpenX, Advertising.com, LifeStreet, SayMedia, Microsoft Media Network, ValueClick, Underdox, CPX, or Neverblue) relating to FACEBOOK PRODUCTS, including, without limitation, any agreement, business relationship, or financial arrangement.
6. (a) YOUR revenues, costs, gross profits, or net operating profits;

(b) the breakdown in revenues, costs, gross profits, or net operating profits attributable to each separate Sambreel application, business or product;

(c) the breakdown in revenues, costs, gross profits, or net operating profits attributable to each internet platform or website for which YOU offer users browser add-ons

or (d) any direct or indirect benefits to Sambreel or any Sambreel subsidiary (whether of an economic or other nature) deriving from the use or provision of FACEBOOK PRODUCTS.
7. The number of customers or users of each of YOUR individual FACEBOOK PRODUCTS from January 1, 2008 through the present.
8. The actual and projected number of user downloads and installations of each of YOUR individual FACEBOOK PRODUCTS,

¹ “YOU” and “YOUR” shall refer to Sambreel, its subsidiaries, businesses, products, officers, directors, shareholders, agents, representatives, employees, attorneys, consultants, investigators, and anyone who acted or purports to act on Sambreel’s behalf.

² “FACEBOOK PRODUCTS” shall include any products or businesses designed, created, or marketed for use by Facebook users or in conjunction with Facebook, including, without limitation, PageRage, Theme Your World, Paxson, or Cause Layouts.

9. The actual and projected number of FACEBOOK PRODUCT users who uninstall or otherwise disable FACEBOOK PRODUCTS after downloading such FACEBOOK PRODUCT and dates of uninstall, distinguishing between paid and non-paying Sambreel users.
10. All data Plaintiffs obtained from Facebook users.
11. Data that YOU retrieved, downloaded, or otherwise obtained from FACEBOOK PRODUCT users.
12. Attempts or efforts by YOU, whether successful or not, to circumvent, bypass, or otherwise overcome any technical- or code-based barriers or other measures designed to block www.pagerage.com.
13. Communications between YOU and any past, current, or prospective FACEBOOK PRODUCT users concerning any FACEBOOK PRODUCTS, including, without limitation, any comments, complaints, inquiries, or feedback.
14. Documents relating to any Plaintiff circumvention of technical measures to block “pagerage.com”.
15. Communications to, from, copying, or concerning the following individuals relating to Facebook or any FACEBOOK PRODUCTS, or YOUR interface with any FACEBOOK PRODUCT, or any advertising in connection with any FACEBOOK PRODUCT: (a) Arie Trouw; (b) Markus Levin; (c) Brad Miller; (d) Andrew Sullivan; (e) John Arana, or (f) Kai Hankinson
16. Communications between YOU and Facebook, including, without limitation, any Facebook employee, agent, representative, attorney, or anyone who acted or purports to act on Facebook’s behalf.

POTENTIAL INTERROGATORY TOPICS

1. Facebook user accounts created or used by any of YOUR directors, officers, employees, or agents, including, without limitation, any Facebook accounts used for “testing” of any FACEBOOK PRODUCT.
2. The irreparable harm suffered that YOU have suffered resulting from the conduct alleged in the Complaint.
3. The number of PageRage users YOU contend Sambreel lost because of the conduct alleged in the Complaint.
4. Each person or entity YOU contend has ceased purchasing advertising from Sambreel because of the conduct alleged in the Complaint.

5. Identification of any and all Facebook accounts used by any of Plaintiffs employees, including accounts used for “testing” FACEBOOK PRODUCTS.
6. The allegations in the Complaint that Facebook organized a group boycott of Sambreel.
7. The allegations in the Complaint that Facebook “gated” Facebook users who had downloaded any FACEBOOK PRODUCT.
8. The allegations in the Complaint that that the three relevant product markets are: (i) the market for social networking services, (ii) the market for products that allow users to customize or enhance social networking websites, and (iii) the market for online display advertising, including the submarket for display advertising to social media users.

POTENTIAL PARTY WITNESSES TO BE DEPOSED

1. Arie Trouw (Sambreel CEO)
2. Markus Levin (gave declaration; CEO of Sambreel subsidiary responsible for interacting with entities that market Sambreel’s products)
3. Brad Miller (gave declaration; Sambreel Chief Revenue Officer)
4. Andrew Sullivan (gave declaration; CEO of Sambreel subsidiary responsible for interacting with entities that buy ads from Sambreel)
5. 30(b)(6) witness